

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

**IN RE: CENTURYLINK SALES
PRACTICES AND SECURITIES
LITIGATION**

This Document Relates to:

Civil Action No. 18-296 (MJD/KMM)

MDL No. 17-2795 (MJD/KMM)

**DEFENDANTS' STATEMENT
OF CONFIDENTIALITY
REGARDING EXHIBITS TO
DEFENDANTS' MEMORANDUM
OF LAW IN OPPOSITION TO
PLAINTIFFS' MOTION FOR CLASS
CERTIFICATION AND
APPOINTMENT OF CLASS
REPRESENTATIVES AND CLASS
COUNSEL**

Defendants in the above-captioned matter have filed Exhibits 1-11 to the Declaration of Ryan Blair. Pursuant to the Protective Order (ECF No. 464), Blair Exhibits 5 and 7 have been designated "Confidential" and/or "Highly Confidential – Attorneys' Eyes Only" in their entirety. Because of these designations, redaction is impractical.

Dated: March 23, 2020

Respectfully submitted,

/s/ William A. McNab

William A. McNab (MN Bar No. 320924)

David M. Aafedt (MN Bar No. 27561X)

WINTHROP & WEINSTINE, P.A.

Capella Tower, Suite 3500

225 South Sixth Street

Minneapolis, MN 55402

Phone: (612) 604-6400

Fax: (612) 604-6800

wmcnab@winthrop.com

daafedt@winthrop.com

Patrick E. Gibbs (CA Bar No. 183174)
COOLEY LLP
3175 Hanover Street
Palo Alto, California 94304
Phone: (650) 843-5000
Fax: (650) 849-7400
pgibbs@cooley.com

Ryan Blair (CA Bar No. 246724)
COOLEY LLP
4402 Eastgate mall
San Diego, CA 92121
Phone: (858) 550-6047
Fax: (858) 527-2750
rblair@cooley.com

Douglas P. Lobel (VA Bar No. 42329)
David A. Vogel (VA Bar No. 48971)
Dana A. Moss, VA Bar No. 80095
COOLEY LLP
11951 Freedom Drive
Reston, Virginia 20190
Phone: (703) 456-8000
Fax: (703) 456-8100
dlobel@cooley.com
dvogel@cooley.com
dmoss@cooley.com

Sarah M. Lightdale (NY Bar No. 4395661)
COOLEY LLP
1114 Avenue of the Americas
New York, New York 10036
Phone: (212) 479-6000
Fax: (212) 479-6275
slightdale@cooley.com

Jerry W. Blackwell (MN Bar No. 186867)
BLACKWELL BURKE P.A.
431 South 7th Street, Suite 2500
Minneapolis, MN 55415
Telephone: (612) 343-3200

blackwell@blackwellburke.com

*Attorneys for Defendants CenturyLink, Inc.,
Glen F. Post, III, R. Stewart Ewing, Jr.,
David D. Cole, Karen Puckett, Dean J.
Douglas, and G. Clay Bailey*

18935812v1